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March 22, 2017

**BY FEDERAL EXPRESS**

Anne Rauch, Esq.  
Office of Regional Counsel  
US EPA, Region VII  
901 North 5th St.  
Kansas City, KS 66101

Dear Ms. Rauch:

Enclosed please find additional documents from Big Ox Energy that are responsive to the EPA's Information Requests. Big Ox claims the information enclosed as confidential trade secrets and requests that the information be maintained as confidential.

Best ,



Sara R. Nies

Encls.

**Additional Documents from Big Ox Energy in Response to EPA Region VII'S Clean Air Act Information Request**

3. Describe how the gas stream to the biogas flare is monitored for total reduced sulfur and/or hydrogen sulfide. Provide all calculations and monitoring of total reduced sulfur and hydrogen sulfide concentration and/or mass since the facility began operating to the present. Where the information is recorded and/or maintained electronically, provide an electronic copy of the data in Excel or similar format.

**Documents:**

Exhibit A: Gas Readings Worksheet - SSC.xlsx

4. Describe how the gas stream flow to the biogas flare is monitored. Provide all biogas flare gas stream flow monitoring data and/or calculations since the facility began operating to the present. Where the information is recorded and/or maintained electronically, provide an electronic copy of the data in Excel or similar format.

**Documents:**

Exhibit B: Flare hours.xlsx

Exhibit C: Flare Event Details.xlsx

5. Describe how Bix Ox ensures that a flame is present in the biogas flare when biogas is being routed to it. Provide all biogas flare flame and temperature monitoring data since the facility began operating to the present. Describe how the information is recorded and/or maintained electronically, provide an electronic copy of the data in Excel or similar format.

**Documents:**

Exhibit D: John Zink Manual - Biogas Flare System.pdf

6. Provide the date(s) and start and stop time(s) for all biogas flaring events at the facility since the facility began operating to the present.

**Response:**

Exhibit B: Flare hours.xlsx

7. Provide all date(s) and start and stop time(s) when the biogas cleanup skid system was in use.

**Response:**

BOE has only operated the gas clean up skid for commissioning on 02/13, 02/15 and 03/20 - present.

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8. Describe all periods when anaerobic digestion biogas has been emitted directly to the atmosphere since the facility began operating, including, but not limited to, a description of the date, start time, stop time, location or emission point, cause of each episode; and any calculations of hydrogen sulfide.

**Response:**

Exhibit D: PRV Release Events & Records.xlsx

13. What design and operating standards are employed to prevent a release of hydrogen sulfide and maintain a safe facility? Provide a list of adopted or followed relevant industry codes, practices, and standards for the process involving hydrogen sulfide.

**Documents:**

Exhibit F: Codes & Standards List.pdf

**BOE safety plans**

- a. Exhibit G: BOE Siouxland Emergency Action Plan .pdf
- b. Exhibit H: SSC Fire & Occupancy Plan.pdf
- c. Exhibit I: SSC Roof Classification Plan.pdf
- d. Exhibit J: H2S AWARENESS.DOCX
- e. Exhibit K: CONFINED SPACE.DOCX
- f. Exhibit L: HAZCOM.DOCX
- g. Exhibit M: LOCK OUT-TAG OUT.DOCX
- h. Exhibit N: H2S safety training .PDF
- i. Exhibit O: PPE Hazard Assessment - Yeast.pdf
- j. Exhibit P: PPPE Hazard Assessment Dried Blood
- k. Exhibit Q: RESPIRATORY PROTECTION.DOCX
- l. Exhibit R: BOE Siouxland Emergency Action Plan .docx

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14. Provide any documents associated with the identification of hazards from the process related to the incidents and hazard assessments of accidental releases with steps taken to minimize consequences of accidental release.

**Response:**

BOE is developing a robust General Duty Clause plan with EPA including a comprehensive hazard assessment, release consequences and mitigation plan. BOE will share all progress and activity as this plan develops, but before 03/31/2017.

15. Are hydrogen sulfide monitors in use at the facility? If so, describe their use, make, model, locations used and provide an electronic copy of the data in Excel or similar format since plant operations began to present.

**Documents:**

Exhibit S: Gas Detection Upgrade Summary.docx

Exhibit T: Industrial Scientific - DSX Docking Station.pdf

Exhibit U: Industrial Scientific - Ventis Pro Series.pdf.